

## **EXHIBIT 7**

1 Page 1

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4  
IN THE UNITED STATES DISTRICT COURT  
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6  
NORTHERN DISTRICT OF OHIO  
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8  
EASTERN DIVISION  
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10  
11 IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
12 OPIATE LITIGATION

13 Case No. 17-md-2804

14 Judge Dan Aaron

15 This document relates to: Polster

16 The County of Cuyahoga v. Purdue  
17 Pharma L.P., et al.

18 Case No. 18-OP-45090

19 City of Cleveland, Ohio v. Purdue  
20 Pharma L.P., et al

21 Case No. 18-OP-45132

22 The County of Summit, Ohio, et al.  
23 v. Purdue Pharma L.P., et al.

24 Case No. 17-OP-45004  
25  
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17 Videotaped Deposition of  
18 KEITH MARTIN

19 April 3, 2019

20 9:11 a.m.

21 Taken at:  
22 Ulmer & Berne  
23 1660 W. 2nd Street, Suite 1100  
24 Cleveland, Ohio

25 Renee L. Pellegrino, RPR, CLR

1       acquired outside the performance of your  
2       official duties, you can give an opinion, you  
3       can give your personal opinion.

4           A.       Again, it's my opinion that, you  
5       know, we -- we got to this place somehow, and it  
6       wasn't just through heroin or fentanyl.

7           Q.       But my question was a little more  
8       specific than that. My question was, without  
9       heroin, without fentanyl, without carfentanil,  
10       wouldn't you agree that -- would there be an  
11       opioid epidemic in Ohio today?

12           MR. LEDLIE:   Object to the form of  
13       the question. Asked and answered. Calls for a  
14       legal conclusion.

15           MR. BENNETT:   Objection.  
16       Speculation. Same instruction.

17           A.       My personal belief is we would.

18           Q.       What is that personal belief based  
19       on?

20           A.       I've talked to many parents who have  
21       lost a child to an overdose, and to be quite  
22       honest, it makes me sick because I'm tired of  
23       talking to these parents. And in many, many  
24       cases they started out taking an opiate and they  
25       didn't start out using heroin or fentanyl, it

1       started some other way. And in almost -- in  
2       many of those cases it started with either  
3       OxyContin, oxycodone, Vicodin, Percocet,  
4       something, whether it was a sports injury,  
5       whether it was somebody giving it to their  
6       child. So, you know, I'm basing that on my  
7       conversations with parents who have buried their  
8       children in Ohio.

9           Q.        Let me ask you if you're familiar  
10      with the Controlled Substance Act.

11           A.        Yes.

12           Q.        Are you familiar with the closed  
13      system of pharmaceutical distribution under the  
14      CSA?

15           A.        No, I'm not.

16           Q.        You've never heard of the closed  
17      system of distribution?

18           A.        No.

19           Q.        Okay. Do you agree that most  
20      diversion of prescription opioids happens  
21      outside of this closed system?

22           MR. LEDLIE: Object to the form of  
23      the question.

24           MR. BENNETT: Objection. Calls for  
25      speculation.